

Commonwealth of Kentucky
Division for Air Quality
RESPONSE TO COMMENTS

ON THE TITLE V DRAFT PERMIT V-06-001
WACKER POLYMER SYSTEMS, SPRAY DRY PLANT
CALVERT CITY, KENTUCKY
MARCH 23, 2006
JOSHUA J. HIGGINS, REVIEWER

SOURCE I.D. #: 21-157-00050
SOURCE A.I. #: 39186
ACTIVITY #: APE20040001

SOURCE DESCRIPTION:

The Spray Dry Plant consists of 2 process lines, constructed in 1987 and 1995, which produce a dried emulsion product. The dried emulsion is made by mixing wet emulsion from the Air Products Emulsion Plant, PVOH from the Air Products PVOH Plant, water and some additives batch-wise in tanks then continuously feeding the solution into the Spray Dry Towers, which dry the solution to a powder. The spray dried powder is mixed with a clay filler and processed through a product-recovery baghouse, product filter, screener, and silo before being bagged. Both lines have identical equipment except that the second process line has 2 recycle bins—one for recycled product and one for additives.

Pollutants that are emitted from this source are methanol and vinyl acetate, and particulate.

The Spray Dry Plant was part of Air Products and Chemicals, Inc. (21-157-00009) and ownership was transferred to Wacker Polymer Systems (Wacker) in 1998. This is a renewal of Wacker's initial Title V permit, V-99-057, issued April 12, 2000.

PUBLIC AND U.S. EPA REVIEW:

On February 15, 2006, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Lake News* in Calvert City, Kentucky. The public comment period expired 30 days from the date of publication.

No comments were received during this period. The permit is now being issued as a proposed permit. The U.S. EPA has 45 days from the date of the issuance to submit comments. If no comments are received during this period, the Division will consider the permit final as conditioned.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.